

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 7
)
 JOHN W. THUNHOLM,) Case No. 19-33561
)
 Debtor.) Hon. David D. Cleary
)
) Hearing: December 1, 2021 at 10:00 a.m.

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Wednesday, December 1, 2021, at 10:00 a.m., I will appear before the Honorable David D. Cleary or any judge sitting in that judge's place, and present the Trustee's Motion to Reopen Chapter 7 Case (the "Motion"), a copy of which is attached.

This Motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the Motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com>. Then enter the meeting ID and passcode.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID.

Meeting ID and password. The meeting ID for this hearing is 161 122 6457 The passcode is Cleary644. The meeting ID and further information can also be found on Judge Cleary's web page on the Court's website.

If you object to this Motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the Motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the Motion in advance without a hearing.

Dated: November 17, 2021

Ronald R. Peterson
353 N. Clark Street
Chicago, IL 60654-3456
PH: 312/923-2981
FAX: 312/840-7381
rpeterson@jenner.com

RONALD PETERSON, not individually but as
Chapter 7 Trustee for John W. Thunholm

BY: /s/ Ronald Peterson

CERTIFICATE OF SERVICE

I, Ronald Peterson, certify that I caused a copy of the foregoing **Motion To Reopen Chapter 7 Case** to be served upon the parties listed on the attached Service List by depositing same in the U.S. Mail receptacle located at 353 N. Clark Street, Chicago, Illinois, before the hour of 4:00 p.m. and via the Court's ECF electronic mail noticing system on November 17, 2021.

/s/ Ronald Peterson

Ronald Peterson

SERVICE LIST

Via ECF

O Allan Fridman allanfridman@gmail.com, Fridman@IAmTheWolf.com

Patrick S Layng USTPRegion11.ES. ECF@usdoj.gov

Todd J Ruchman amps@manleydeas.com

Via U.S. Mail

John W Thunholm
1038 Marshall Road
Northbrook, IL 60062

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541

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MOTION TO REOPEN CHAPTER 7 CASE

Ronald Peterson, not individually but as the former interim chapter 7 trustee (the “Trustee”) of the bankruptcy estate of John W. Thunholm (the “Debtor”), respectfully requests entry of an order reopening this chapter 7 case to administer an asset, and states:

1. On November 26, 2019, the Debtor filed a petition for relief under chapter 7 of title 11 of the United States Code. Thereafter, the Trustee was appointed.
2. On February 5, 2020, after examining the Debtor at the section 341 meeting of creditors, the Trustee filed a Report of No Distribution. (Dkt. 17). On March 2, 2020, the chapter 7 case was closed. (Dkt. 21).
3. The Trustee recently learned that the Debtor has received an offer in the amount of \$105,000 to settle an unscheduled products liability claim based on physical injuries the Debtor was diagnosed with in 2015 as a result of exposure to the product. The personal injury claim and any proceeds thereof remain property of the estate because, among other reasons, the claim arose before the petition date and was not scheduled.
4. Accordingly, the Trustee requests that the Court reopen the chapter 7 case and direct the U.S. Trustee to appoint a chapter 7 trustee.

WHEREFORE, the Trustee respectfully requests that the Court reopen the chapter 7 case and grant such other relief as may be just.

Respectfully submitted,

RONALD PETERSON, not individually but as
Chapter 7 Trustee for John W. Thunholm

BY: /s/ Ronald Peterson

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